



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

MAR 12 2013

Certified Mail
Return Receipt Requested

Daniel Johansen
Rancho LPG Holdings LLC
2110 North Gaffey Street
San Pedro, California 90731

Re: EPA-R9-2013-003680
CBI Substantiation of Feb. 8, 2013 Submission

Dear Mr. Johansen:

The Environmental Protection Agency ("EPA") has received a request under the Freedom of Information Act (FOIA) that would include the February 8, 2013 submission from Rancho LPG Holdings ("Rancho LPG") to the EPA. Rancho LPG has asserted a business confidentiality claim covering this submission and all of its attachments. In accordance with EPA's FOIA regulations (40 C.F.R. Part 2), the request has been initially denied to afford you an opportunity to substantiate your claim before a final determination is made. Because of its size, a copy of the February 8, 2013 submission is not enclosed. EPA will make available a copy of the document at your request.

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6. For each category of information claimed as confidential, discuss with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
7. Do you assert that the information is "voluntarily submitted" as defined at 40 C.F.R. § 2.201(i)? If so, explain why, and how disclosure would tend to lessen EPA's ability to obtain similar information in the future.
8. Any other issue you deem relevant.

Please note that you bear the burden of substantiating your confidentiality claim pursuant to 40 C.F.R. § 2.208(e). Conclusory allegations will be given little or no weight in EPA's determination.

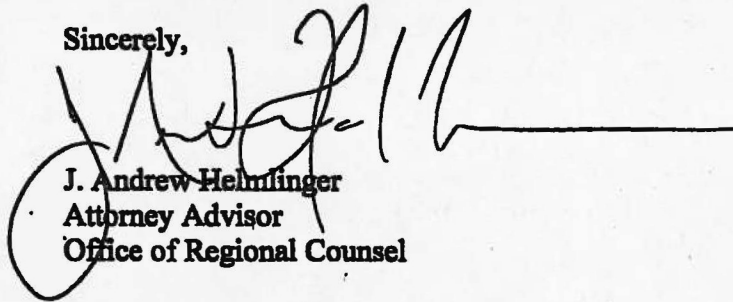
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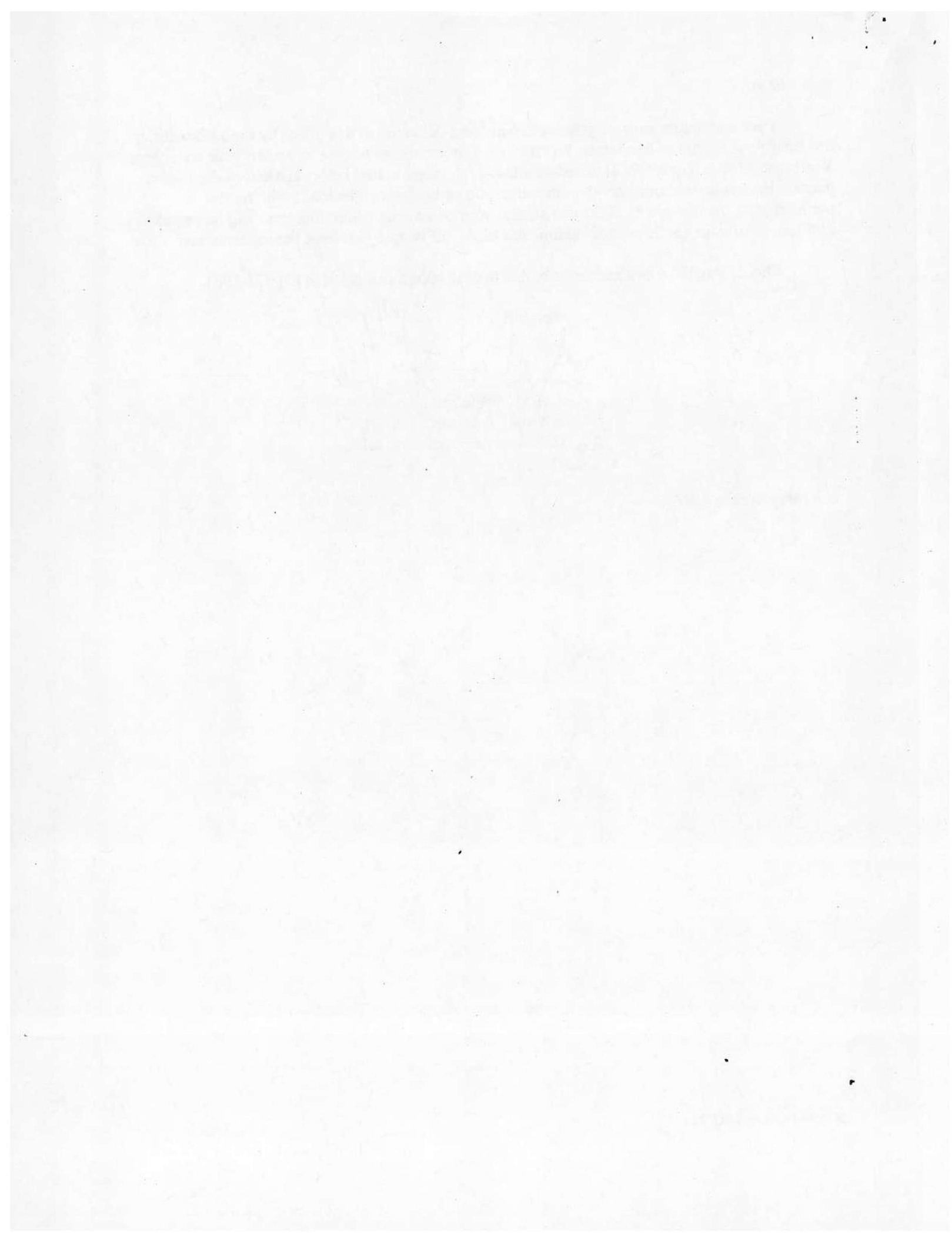
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J. Andrew Helminger
Attorney Advisor
Office of Regional Counsel

cc: Mary Wesling, EPA



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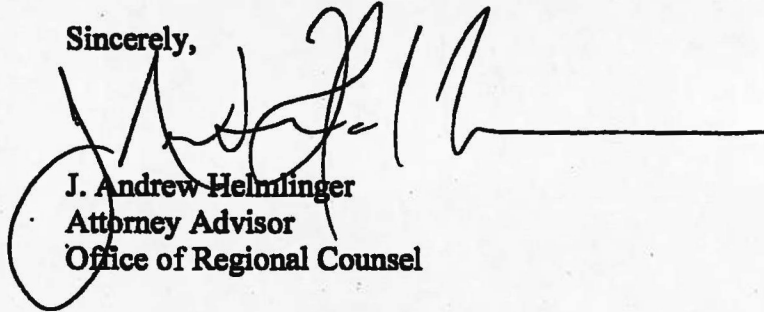
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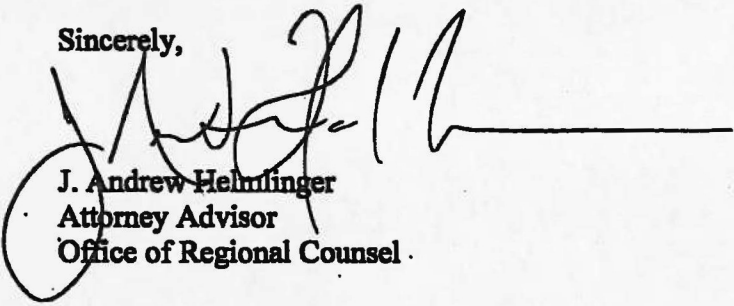
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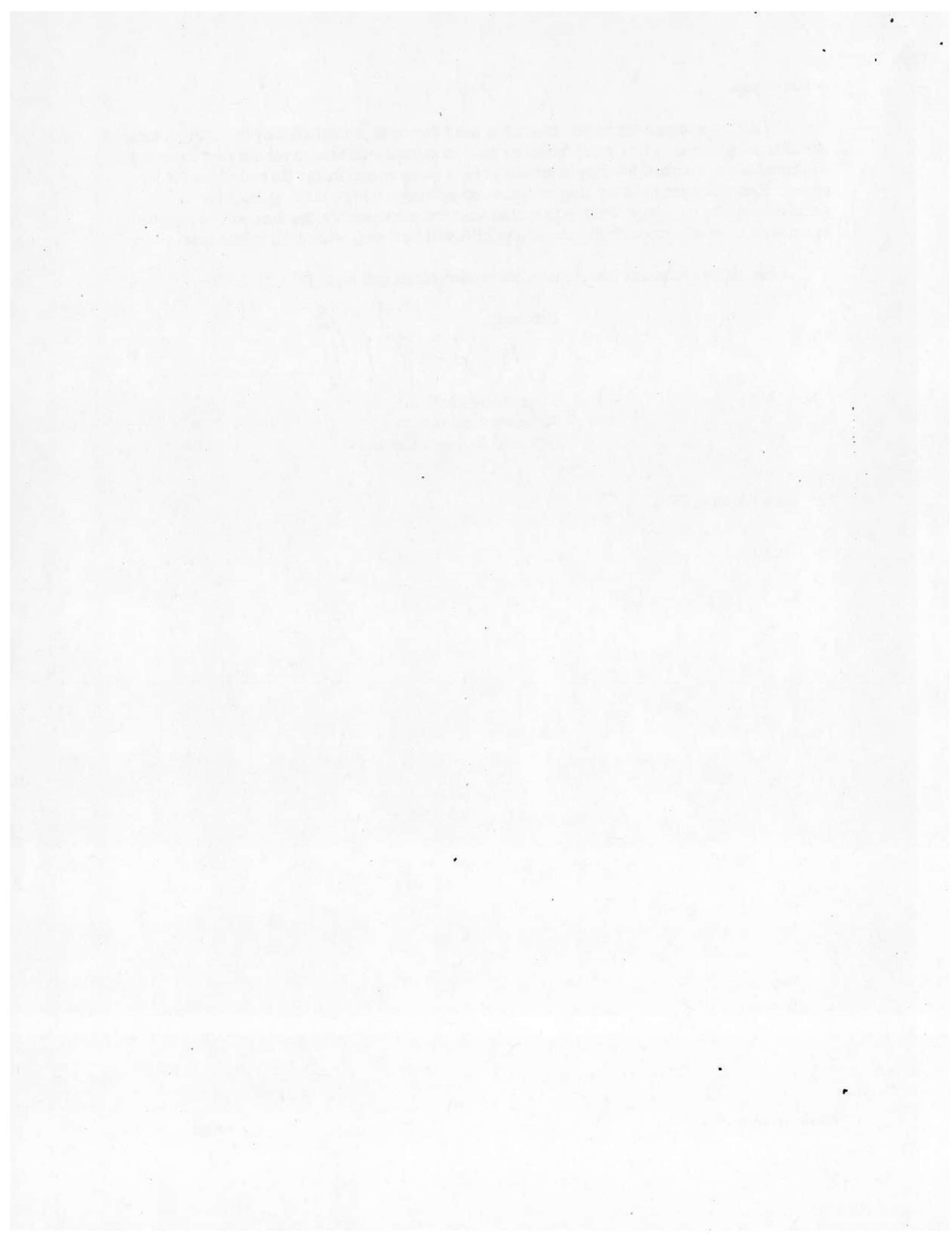
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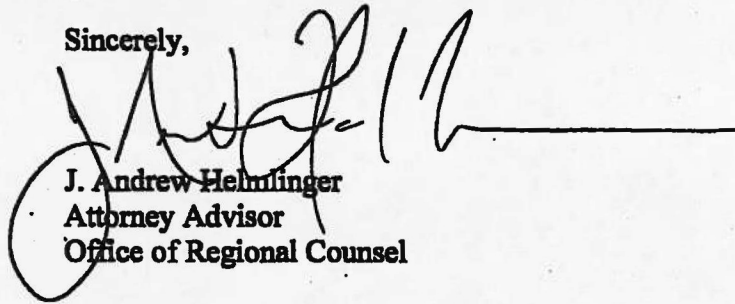
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